

EXHIBIT 4

Page 1

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF GEORGIA
3 ATLANTA DIVISION
4 DONNA CURLING, ET AL.,)
5)
6 Plaintiffs,)
7)
8 vs.) CIVIL ACTION NO.
9)
10)
11 BRAD RAFFENSPERGER, ET) 1:17-CV-2989-AT
12 AL,)
13)
14 Defendants.)
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VIDEOTAPED 30 (b) (6) DEPOSITION OF GABRIEL STERLING
(Taken by Plaintiffs)

February 24, 2022

9:07 a.m.

25 Reported by: Debra M. Druzisky, CCR-B-1848

Page 8

1 THE VIDEOGRAPHER: All right. This
2 will be the deposition of Gabriel Sterling
3 in the case of Curling versus
4 Raffensperger, File Number
5 1:17-CV-2989-AT. Today's date is February
6 24th, 2022, and the time is 9:07 a.m. And
7 we are on the record.

8 Would the court reporter please swear
9 in the witness?

10 GABRIEL STERLING,
11 having been first duly sworn, was examined and
12 testified as follows:

13 EXAMINATION

14 BY MR. CROSS:

15 Q. Good morning, Mr. Sterling.

16 A. Good morning, Mr. Cross.

17 (Whereupon, a technical discussion
18 ensued off the record.)

19 BY MR. CROSS:

20 Q. All right. Mr. Sterling, I understand
21 you've been deposed before, I think relatively
22 recently, in fact, so this will be similar to your
23 prior experience.

24 You -- do you understand that you're here
25 to testify today on behalf of the Secretary of

1 what the risk is.

2 There's a much higher risk for somebody
3 if -- depending on what the goals are, too. If
4 you're trying to flip votes, if you're trying to
5 cause chaos within the system, the voter
6 registration system, you know, if you wanted to go
7 after something, as I stated earlier, flipping the
8 voter identification numbers could cause chaos, but
9 it wouldn't necessarily hurt outcomes of votes.

10 It's too specific [sic] of a question to
11 give you a specific answer to. I mean, you would
12 need to really narrow it down and say in this
13 instance here, in this instance here, in this
14 instance here, if that makes sense.

15 Q. Sure. The thrust of the Secretary's quote
16 that the Halderman report didn't reflect real
17 world, though, the presumption there, you would
18 agree with me, is that Halderman had more access
19 than other actors have to the voting system;
20 correct?

21 A. More access and potentially even passwords
22 and things like that, as I understand it. So yeah,
23 I think in general he would have more access.

24 Now, granted, as I stated earlier in the
25 other part of the deposition, bad actors can be bad

1 actors, whether that's with hand-marked paper
2 ballots or computers. So you always have to be on
3 the lookout for that potentiality.

4 And you know, there's no way to ever know
5 for certain if there's not a bad actor somewhere.
6 But the vulnerabilities are across every kind of
7 voting system manufactured by every manufacturer
8 and every style.

9 Q. Okay. Besides government people, Dominion
10 folks and the experts in this case, including
11 Professor Halderman, are you aware of any
12 unauthorized person who has obtained long-term
13 access to Georgia's voting system, to any of the
14 components or to the software?

15 MR. RUSSO: Objection to form.

16 THE WITNESS: When you say "voting
17 system," are you referring to,
18 essentially, all the components of the
19 voting system, E.M.S.s, voter
20 registration, I mean, every part and
21 parcel?

22 BY MR. MCGUIRE:

23 Q. Yeah. That's what I'm --

24 A. I am --

25 Q. -- referring to.

R E P O R T E R C E R T I F I C A T E
STATE OF GEORGIA)
COBB COUNTY)

I, Debra M. Druzisky, a Certified Court Reporter in and for the State of Georgia, do hereby certify:

That prior to being examined, the witness named in the foregoing deposition was by me duly sworn to testify to the truth, the whole truth, and nothing but the truth;

That said deposition was taken before me at the time and place set forth and was taken down by me in shorthand and thereafter reduced to computerized transcription under my direction and supervision. And I hereby certify the foregoing deposition is a full, true and correct transcript of my shorthand notes so taken.

Review of the transcript was requested. If requested, any changes made by the deponent and provided to the reporter during the period allowed are appended hereto.

I further certify that I am not of kin or counsel to the parties in the case, and I am not in the regular employ of counsel for any of the said parties, nor am I in any way financially interested in the result of said case.

IN WITNESS WHEREOF, I have hereunto
subscribed my name this 3rd day of March, 2022.

Abraham Drayton

Debra M. Druzisky
Georgia CCR-B-1848